

EXHIBIT

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Declaration of Peter C. Salerno
In Support of Defendant Yassin Kadi's Motion
To Exclude the Testimony of Victor Comras

03 MDL 1570

July 31, 2023

U.S. DEPARTMENT OF THE TREASURY

Treasury Designates Bosnian Charities Funneling Dollars to Al Qaida

May 6, 2004

(Archived Content)

FROM THE OFFICE OF PUBLIC AFFAIRS

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In another step today to halt the flow of terrorist dollars that have tainted the charitable community, the U.S. Department of the Treasury Department designated three Bosnian charities under Executive Order 13224. The U.S. is asking the United Nations' 1267 Sanctions Committee to add these entities to its consolidated list of terrorists tied to al-Qaida, Usama bin Laden and the Taliban.

"Today's action continues the international drumbeat to expose the terrorist nodes used to support the infrastructure of hate, said Juan Zarate, the Treasury Department's Deputy Assistant Secretary for the Executive Office of Terrorist Financing and Financial Crimes.

"Unfortunately, we have seen the vulnerabilities of charities in countries like Bosnia, where there is not only a need for charitable giving but also a susceptibility that such institutions will be co-opted by terrorist sympathizers."

The United States previously designated Bosnian-operated charities that were funneling dollars for terrorist-related activities, including the Benevolence International Foundation (BIF), the Global Relief Foundation (GRF) and the Bosnian branch of Al-Haramain Foundation (AHF), including its director and Vazir, an alias for the organization.

Today's action by the Treasury Department designates the following entities:

Al Furqan

Information shows this non-governmental organization had close ties and shared an office with GRF and was chiefly sponsored by the Bosnian branch of AHF. Individuals working for Al Furqan have been involved in multiple instances of suspicious activity, including surveillance of the U.S. Embassy and U.N. buildings in Sarajevo. Although Al Furqan

ostensibly ceased operations in 2002, two successor organizations, Sirat and Istikamet, continue to act on behalf of Al Furqan in Bosnia.

A.K.A.s

Dzemilijati Furkan; Dzem'iijetul Furqan; Association for Citizens Rights and Resistance to Lies; Dzemijetul Furkan; Association of Citizens for the Support of Truth and Suppression of Lies; Sirat; Association for Education, Culture and Building Society-Sirat; Association for Education, Cultural and to Create Society-Sirat; Istikamet; In Siratel.

Addresses

Put Mladih Muslimana 30a
71 000 Sarajevo, BiH

ul. Strossmajerova 72
Zenica, BiH

Muhameda Hadzijahica 42
Sarajevo, BiH

Al-Haramain & Al Masjed Al-Aqsa Charity Foundation

According to information, the Bosnian branch of this entity has significant financial ties to al Qaida financier Wa'el Hamza Julaidan who was designated by the Treasury Department on September 6, 2002. Al-Haramain & Al Masjed Al-Aqsa Charity Foundation also provided financial support to Al Furqan.

A.K.A.s

Al Haramain Al Masjed Al Aqsa; Al Haramayn Al Masjid Al Aqsa; Al-Haramayn and Al Masjid Al Aqsa Charitable Foundation

Address

Hasiba Brankovica No. 2A
Sarajevo, BiH

Taibah International – Bosnia Branch

Information shows this entity has significant ties to GRF, which initially operated in Bosnia under the auspices of Taibah. A former employee of Taibah International was a member of Ayadi Chafiq Bin Muhammad's network, who was designated by the Treasury Department on October 12, 2001.

A.K.A.s

Taibah International Aid Agency; Taibah International Aid Association; Al Taibah, Intl.; Taibah International Aide Association

Addresses

Avde Smajlovic 6

Sarajevo, BiH

26 Tabhanska Street

Visoko, BiH

No. 3 Velika Cilna Ulica

Visoko, BiH

No. 26 Tahbanksa Ulica

Sarajevo, BiH

Executive Order 13224 provides means to disrupt the support network for terrorism. Under this order, the United States government may block the assets of individuals and entities who provide support – financial or otherwise – to designated terrorists and terrorist organizations, who are owned or controlled by designated terrorists, who act for or on the behalf of designated terrorists or who are otherwise associated with designated terrorists. Blocking actions are critical to combating the financing of terrorism.

When a blocking action is put into place, any assets that exist in the U.S. financial system at the time of the orders are frozen, and U.S. persons are prohibited from transacting or dealing with individuals and entities who are the subject of the blocking action. Blocking actions serve additional functions as well, including serving as a deterrent for non-designated parties who might otherwise be willing to finance terrorist activity; exposing terrorist financing “money trails” that may generate leads to previously unknown terrorist cells and financiers; disrupting terrorist financing networks by encouraging designated terrorist supporters to disassociate themselves from terrorist activity and renounce their affiliation with terrorist groups; terminating terrorist cash flows by shutting down the pipelines used to move terrorist-related assets; forcing terrorists to use alternative, more costly and higher-risk means of financing their activities; and engendering international cooperation and compliance with obligations under U.N. Security Council Resolutions.

To date, the U.S. and our international partners have designated 368 individuals and organizations as terrorists and terrorist supporters and have frozen approximately \$139 million and seized more than \$60 million in terrorist-related assets.

